

Exhibit E

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

NEW JERSEY COALITION OF
AUTOMOTIVE RETAILERS, INC.,

Plaintiff,

v.

MAZDA MOTOR OF AMERICA, INC.

Defendant.

Case No. 3:18-cv-14563-BRM-TJB

DECLARATION OF HARRIS WILDSTEIN

I, Harris Wildstein, declare:

1. I am the owner and dealer principal of Hamilton Mazda. I have personal knowledge of the facts stated herein.
2. Hamilton Mazda is a Mazda dealership located at 2201 Route 33, Hamilton Square, NJ 08690. I have owned Hamilton Mazda since October 1993.
3. Hamilton Mazda is a member of the New Jersey Coalition of Automotive Retailers, Inc. ("NJ CAR"). Hamilton Mazda has been a member of NJ CAR for as long as I have owned the dealership/since October 1993.
4. I understand that Mazda Motor of America, Inc. d/b/a Mazda North American Operations ("Mazda") has a dealer support program known as the "Mazda Brand Experience Program 2.0 ("MBEP").

5. Hamilton Mazda has participated in the MBEP since its inception in July 2018.

6. I do not believe that Hamilton Mazda has been harmed by its participation in the MBEP.

7. I understand that NJ CAR has filed a lawsuit against Mazda seeking a ruling that it is unlawful for Mazda to implement the MBEP in New Jersey (the "Action").

8. I did not direct NJCar to file the Action.

9. I believe that the Action is contrary to the interests of my dealership, and I cannot support it. If the MBEP is declared unlawful, Hamilton Mazda will be harmed because (among other things) it will no longer be able to recover the costs it incurred to comply with the MBEP criteria through future MBEP bonus payments.

I declare under penalty of perjury that the foregoing is true and correct.
Executed in Hamilton Square, New Jersey on December 11, 2018.


Harris Wildstein